



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF SOCIAL JUSTICE  
CIVIL RIGHTS BUREAU

June 13, 2022

**By Electronic Filing**

Hon. Gabriel W. Gorenstein, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

**Re:** *In re: New York City Policing During Summer 2020 Demonstrations,*  
*No. 20-CV-8924*  
This Letter is Related to All Cases

Dear Judge Gorenstein:

I write on behalf of all Plaintiffs to correct statements in the June 10, 2022 letter from Amy Robinson (ECF No. 601). Plaintiffs did not *consent* to any extension of time pursuant to the Court's Individual Rule 2A. Rather, Defendants missed several deadlines set forth in the Court's May 16 Order regarding the production of ARGUS footage and related documents. Instead of involving the Court immediately, Plaintiffs alerted Defendants of their violation of the Court's order and attempted to get the documents as soon as possible after their due date, as the Court has previously required as part of the meet-and-confer process. *See* ECF No. 541 n.1 ("While some disputes may seem unresolvable through the meet-and-confer process, a meeting is still often helpful in obtaining information and in any case is mandatory.").

Indeed, in response to Defendants' declaration, Plaintiffs sent Defendants a deficiency letter identifying missing footage and requested a meet-and-confer this week. Plaintiffs have not excused Defendants' violation of a clear Court order and reserve the right to raise that issue in any future motion after the parties have finished conferring about ARGUS production.

Respectfully submitted,

/s/

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CC: All counsel of record (by ECF)